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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

VERNON UNSWORTH,

Plaintiff

v.

ELON MUSK,

Defendant.

Case No. 2:18-cv-08048-SVW (JCx)

Judge: Hon. Stephen V. Wilson

Magistrate Judge: Jacqueline Chooljian

**[PROPOSED] ORDER GRANTING
MOTION TO COMPEL**

[PROPOSED] ORDER GRANTING MOTION TO COMPEL

This matter is before the Court on Plaintiff's Motion to Compel ("Motion") discovery responses from Defendant Elon Musk regarding a pre-suit investigation into Plaintiff Vernon Unsworth ("Investigation") pursuant to Fed. R. Civ. P. 37 and Local Rule 37.

The Court, having considered the parties' Joint Stipulation on Plaintiff's Motion to Compel, the briefs filed by the parties relating thereto, the declarations and exhibits in support thereof, and good cause appearing, hereby **GRANTS** Plaintiff's Motion as follows:

1. On or before November 19, 2019, Defendant Elon Musk shall produce to Plaintiff Vernon Unsworth all documents obtained during the course of the Investigation, which documents were not created by counsel or the investigator, specifically including but not limited to the birth certificate and/or national I.D. card of Plaintiff's significant other;

2. On or before November 19, 2019, Defendant Elon Musk shall identify to Plaintiff Vernon Unsworth the name of the investigator who conducted the Investigation;

3. On or before November 19, 2019, Defendant Elon Musk shall produce to Plaintiff Vernon Unsworth a privilege log consistent with Rule 26 identifying all documents and communications for which Defendants claims privilege from discovery;

4. Defendant Elon Musk shall make the investigator available for deposition by Plaintiff Vernon Unsworth's counsel on or before November 22, 2019; and

5. Plaintiff Vernon Unsworth is hereby granted his reasonable attorneys' fees and costs in litigating the Motion, and is granted leave to file a request for his fees before the undersigned on or before November 19, 2019.

1 Dated: November ___, 2019

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Honorable Jacqueline Chooljian
United States District Court Magistrate Judge

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